

**Verizon New England Inc.
D/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Nancy Matt

Title: Witness

REQUEST: AT&T Communications of New England, Inc., Set #4

DATED: May 11, 2001

ITEM: ATT 4-2 Please specify whether the Calling Name Delivery port additive is incremental to Calling Number Delivery, or includes Calling Number Delivery, please explain the reason.

REPLY: The Calling Name Delivery feature is incremental to the Calling Number Delivery feature. The Calling Name Delivery cost does not include the Calling Number Delivery cost.

The feature is defined as "Calling Name Delivery" therefore the cost reflects only the cost of "Name" delivery.

VZ #119

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Donald Albert

Title: Director

REQUEST: AT&T Communications of New England, Inc., Set #4

DATED: May 11, 2001

ITEM: ATT 4-9 Please provide the following data about switch equipment forecasted by Verizon for Massachusetts for the period from January 1, 2001, to December 31, 2005, identified by CLI:

- (a) the number of new remotes expected to be installed (specify CLI and vendor);
- (b) the number of switches that will be replaced by a different switch manufacturer (specify CLI and vendor and which ones, if any, were also included in part a above; and
- (c) the number of remote switches that will be replaced by a new remote (specify CLI, manufacturer, and which, if any, were included in parts a or b above).

REPLY:

- (a) Verizon MA is planning to convert its existing stand alone switch in Barnstable (BRNSMAMADS0) to a remote switch in 2002.
- (b) None.
- (c) None.

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-20 (Part A)

Respondent: Nancy Matt
Title: Manager – Service Costs

REQUEST: AT&T Communications of New England, Inc., Set #4

DATED: May 11, 2001

ITEM: ATT 4-31 At page 136 of Verizon's direct panel testimony, Verizon states that it signed a switching agreement with Nortel for Verizon North in December 2000. Please specify the actual date that the agreement was signed. Also please state the first date that Verizon witness Nancy Matt or anyone else in Verizon's service cost organization was notified of the December 2000 agreement between Nortel and Verizon, specifying the individual or individuals, the date they were notified, and the exact manner of notification. Please provide all internal correspondence, notes, memos, e-mails and other documentation that evidences or refers in any manner whatsoever to such notification.

REPLY: Verizon MA objects to this interrogatory on the grounds that it is neither relevant to the subject matter of this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Notwithstanding that objection, Verizon MA provides the following response.

The Nortel contract was signed on December 19, 2000. To the best of our knowledge, the Service Costs organization became aware of the contract orally in the beginning of February 2001.